

Dwight D. Etheridge Jerome D. Mierzwa Christina R. Mudd Kevin L. Porter Serhan Ogur

CONSULTING ECONOMISTS

10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 21044 (410) 992-7500 (410) 992-3445 FAX kporter@exeterassociates.com

REF: 210401

April 8, 2021

Ms. Kathryn H. Bowman Executive Counsel Louisiana Public Service Commission 602 North Fifth Street (Galvez Building) (70802) P.O. Box 91154 Baton Rouge, LA 70821-9154

Re: RFP 21-05 – Docket No. S-35916, Entergy Louisiana, LLC ex parte. In re:

Application for Authorization to Implement a Green Pricing Option, Rider GPO

and Rider LVGPO, and Related Relief

Dear Ms. Bowman:

Exeter Associates, Inc. (Exeter) is pleased to submit this proposal to assist the Staff of the Louisiana Public Service Commission (LPSC or Commission) in reviewing the application of Energy Louisiana, LLC's (ELL or Company) for Two Green Pricing Options, Green Pricing Option (Rider GPO) and Large Volume Green Pricing Option (Rider LVGPO), and related relief.

Scope of Assistance

ELL is a limited liability electric company serving approximately 1.1 million customers throughout 58 parishes and provides natural gas service to approximately 94,000 customers in Baton Rouge, Louisiana. ELL last offered a green pricing option through its Geaux Green option available between 2007-2010, which allowed for customers to voluntarily subscribe to blocks of energy sourced from biomass facilities. The Company is seeking Commission authorization to implement two new renewable energy options Rider GPO and Rider LVGPO, which are voluntary tariffs to allow for customers to match up to 100% of their energy usage with renewable energy credits (RECs). To fulfill an enrolled customer's green pricing option, ELL proposes that it will generate or procure enough RECs from qualified renewable energy sources to match their level of enrolled energy usage. Under Rider GPO, all ELL customers taking metered service and in good standing with the Company will have the opportunity to match 25%, 50%, or 100% of their monthly electric usage with RECs. The Rider GPO will be a month-to-month contract. Non-residential customers that elect to match

at least 500 megawatt-hour (MWh) of electric usage per month can enroll in the Rider LVGPO, which will allow those ELL customers to purchase a fixed, large volume of RECs monthly. LVGPO will require participants to commit to at least one year of participation. The riders would result in an additional monthly charge on the enrolled customers' bills. For Rider GPO, the monthly charge will be dependent upon the level of usage committed and will range from \$0.0100-\$0.0050 per kilowatt-hour (kWh). The monthly rate for Rider LVGPO will be the greater of \$0.0025 per kWh or the monthly average value for the S*P Global Renewable Energy Credit Index for Texas RECs. ELL intends to source the RECs from solar resources currently in operation or approved by the Commission, including from the Capital Region Solar Power Purchase Agreement and from those participating in Schedule REP, which is the ELL Rate for Renewable Energy Pilot Purchases. ELL does not foresee there being a limit on the number of customers that can participate.

ELL is requesting authorization to have the costs and revenues associated with the riders be recovered through the Company's Formula Rate Plan (FRP). While over and under collections will be reflected in the annual RFP, the rates provided within the two riders are designed to shield non-participants from any incremental costs with offering the product over the first three years, per ELL.

Exeter will assist the LPSC in evaluating the riders' design and language and will determine if the rate riders and the proposed recovery methods are in the best interest of the public. Some of the issues Exeter expects to address include:

- Whether solar is the most economical resource;
- Reasonableness of program administrative costs;
- Whether the proposed solar projects will result in the Scope 2 emission reductions projected by ELL;
- Whether longer contract terms would result in price reductions beneficial to ratepayers;
- Whether participating customers receive credit for avoided energy and/or avoided capacity, and the reasonableness of those values; and
- Whether ELL or participating customers own the renewable energy credits.

Plan of Action

Exeter proposes to provide our assistance by performing the following tasks:

- Detailed review of ELL's application;
- Draft discovery and analyze responses;
- Prepare an initial report identifying findings and recommendations;

- Participate in informal meetings with Staff and PCME, as needed;
- Participate in formal status conferences, pretrial conferences, and hearings, as needed;
- Participate in conference calls, meetings, and conferences with the LPSC and its Staff;
- Prepare prefiled direct and rebuttal testimony in support of Staff's recommendations;
- Assist Staff with trial preparation, including cross-examination questions;
- Attendance at certification hearing(s), as needed; and
- Assist in the analysis of potential stipulation terms, and the drafting of applicable briefs, pleadings, motions, and orders of the LPSC.

Exeter will assist Staff in the above necessary actions through to the issuance of the final Commission Order. Exeter is available to provide services for the 12 months specified under Section III – Period of Representation in the RFP.

Qualifications

Exeter has extensive experience addressing utility regulatory matters before the Louisiana Public Service Commission, as well as before other state and federal regulatory agencies. The firm's experience includes a catalog of work in analyzing the operations, books, and records of utility companies and providing expert testimony on all aspects of utility regulation, utility planning, and ratemaking. Exeter also has assisted the Commission with reviewing utility RFPs and with resource certification applications.

The Exeter staff members proposed for this effort have experience with the Commission's orders in the RFP, and MISO's tariffs, rules and planning processes in general. In addition, Exeter has experience with the technical and regulatory aspects of renewable energy resources. In particular, Mr. Kevin Porter, a Principal with Exeter who will lead this effort, specializes in renewable resource development issues. Prior to joining Exeter, he served as an economist with the National Renewable Energy Laboratory (NREL). Mr. Porter and other Exeter staff have assisted Maryland state agencies in the analysis, development, and implementation of renewable portfolio standards and governmental entities in renewable resource procurement. Additionally, Exeter has purchased RECs and evaluated renewable energy power purchase agreements for other clients and is familiar with utility green tariff programs across the country.

Exeter has also assisted Commission Staff with SWEPCO's purchases of energy and capacity from wind energy projects. Exeter testified in Docket No. U-32095, concerning SWEPCO's purchase of 31 MW of wind power from the Flat Ridge 2 wind project in Kansas. Although Mr. Porter did not testify in that case, he provided research support and technical assistance to Mr. Matthew Kahal, a consultant to Exeter. Mr. Porter testified in Docket No.

U-32814 regarding SWEPCO's purchase of 358 MW of wind power from five wind projects located in Kansas, Oklahoma, and Texas. Both cases resulted in a settlement between Commission Staff and SWEPCO. Additional projects that Exeter has undertaken for the Commission include:

- Review of Concordia Electric Cooperative's application for approval of an Updated Advance Metering Program (Docket No. U-35456);
- Review of Southwest Louisiana Electric Membership Corporation's application for approval of an Advance Metering Program (Docket No. U-35707);
- Review of Pointe Coupee's application for approval of an Advance Metering Program (Docket No. U-35877)
- Investigation of Central Louisiana Electric Company's (Cleco's) fuel adjustment filings for the years 2003-2008;
- Investigation of Cleco's resource planning, procurement practices, and incurred fuel costs for the period January – October 2005 (initiated by the Commission as a result of the effect of Hurricanes Katrina and Rita on the fuel and purchased power cost of Louisiana electric utilities);
- Review of Cleco's application for Commission certification of the acquisition of the Coughlin Power Station from its affiliate, Cleco Evangeline, LLC;
- Investigation into whether Trans Louisiana Gas Company (TransLa) and Louisiana Intrastate Gas Company included inappropriate or imprudent costs in their purchased gas cost recovery mechanisms from 1981-1994;
- Review of the Rate Stabilization Pilot Program of TransLa for the 2004-05 through 2006-07 winter seasons; and
- Audit of the purchased gas cost adjustment (PGA) filings of TransLa and Louisiana Gas Services for the period April 2012 – March 2014 (Docket No. U-33480).

Proposed Team

We propose that this project be conducted under the direction of Kevin L. Porter, a Principal at Exeter with over 35 years of experience in renewable energy technologies, with a focus on the design, implementation and evaluation of renewable energy policies and grid integration of renewable energy technologies. Mr. Porter is considered one of the leading experts on renewable energy policy design and implementation and has authored or co-authored numerous journal articles and research reports.

Mr. Porter will be assisted by Stacy Sherwood, a Senior Analyst at Exeter. Ms. Sherwood has testified regarding the smart meter installation plan in Pennsylvania Public Utility Commission (PUC) Docket No. P-2015-2497267, Petition of Duquesne Light Company for approval of its Smart Meter Procurement and Installation Plan. Prior to joining Exeter,

Ms. Sherwood worked for six years with the Maryland Public Service Commission (PSC) reviewing advanced metering plans for Maryland's investor-owned utilities—Baltimore Gas & Electric Company and Potomac Electric Power Company—as well as reviewing the advanced metering plans of Southern Maryland Electric Cooperative. Ms. Sherwood has filed testimony in the following cases before the Pennsylvania PUC: Docket No. M-2015-2515642, Petition of PPL Electric Utilities Corporation for approval of its Act 129 Phase III Energy Efficiency and Conservation Plan; Docket No. M 2015-2515375, Petition of Duquesne Light Company for approval of its Act 129 Phase III Energy Efficiency and Conservation Plan; and Docket No. M-2015-2477174, Petition of UGI Utilities, Inc. for approval of its Phase II Energy Efficiency and Conservation Plan. Ms. Sherwood provides ongoing assistance to the Pennsylvania Office of Consumer Advocate (OCA) and the Arkansas Office of Attorney General on their respective utility electric and natural gas energy efficiency plans and collaborative working groups. Other members of Exeter's staff will also be available to assist, if necessary.

Exeter's corporate qualifications are provided in Attachment A to the proposal. Detailed resumes for Exeter's key personnel are included as Attachment B to this proposal. Exeter would be pleased to provide additional copies of the complete resumes of our key project team members or any other additional information the Commission may find helpful.

Cost Proposal

Exeter proposes to provide the assistance described above for a budget not to exceed \$60,000, plus direct expenses not to exceed \$2,000. Exeter will bill for professional services at our standard hourly billing rates, which range from \$85 per hour for research assistants to \$225 for principals. The billing rate for Mr. Porter is \$200 per hour, while Ms. Sherwood's billing rate is \$135 per hour. Exeter's budget estimate includes the costs associated with a one-person trip to Louisiana for two days of hearings/conferences. Direct expenses will be billed at State-authorized rates as specified in the Travel Policies and Procedures Memorandum issued by the State of Louisiana, Division of Administration in effect at the time such expenses are incurred.

Conflict of Interest

Please note that Exeter has no business relationship with ELL or any of its affiliates, nor have we ever had such a relationship. We also have no business relationship with any renewable energy developer. Thus, we have no conflict of interest that could impair or restrict our ability to provide assistance and objective advice to Staff.

If you have any questions of either a technical or contractual nature, please do not hesitate to call. We look forward to again being of service to the Commission and the ratepayers of Louisiana.

Very truly yours,

Kevin L. Porter Vice President

KLP/ccc Enclosure

ATTACHMENT A

Corporate Qualifications

APPENDIX A EXETER ASSOCIATES, INC. **10480 LITTLE PATUXENT PARKWAY SUITE 300** COLUMBIA, MARYLAND 21044 **CORPORATE QUALIFICATIONS**

EXETER ASSOCIATES, INC. CORPORATE QUALIFICATIONS -- GENERAL

Exeter Associates, Inc. provides economic and financial consulting services in the areas of public utility regulation, energy, and antitrust economics. The firm maintains the highest standards in the application of economic and financial analysis to both quantitative and policy issues in the electric, gas, and other industries.

Exeter Associates, Inc. is distinguished by the breadth of experience and expertise of its senior professionals. Each holds an advanced degree in economics or a related field with extensive experience in his or her area of expertise, and each is a recognized expert in one or more of the areas of analysis and research shown below.

Public Utility Regulation (Electric, Gas, and Water/Wastewater)

- Alternative regulatory structures
- Local competition
- Industry restructuring
- Privatization
- Wholesale/retail wheeling
- Mergers and acquisitions
- Costing methodologies
- Imputation standards/nonaccounting safeguards
- Structural separation remedies

- Rate structure and rate design
- Marginal costs and rates
- Rate of return
- Affiliate company relationships
- Revenue requirements
- Utility financial condition
- Utility productivity studies
- Depreciation

Econometric and Energy Modeling

- Demand and cost analysis
- Energy supply forecasting
- Load forecasting

- Conservation and load management analysis
- Economic analysis of environmental policies

Industry Analysis

- Electric utilities
- Water/sewer utilities

Oil and natural gas

Cost/Benefit Analysis

Life-Cycle Cost Analysis

Financial Modeling and Analysis

Evaluation/Acquisition of Alternative Utility Supplies

ELECTRICITY

Exeter staff has been continuously involved in electric utility industry regulatory issues since the Company began operating in 1981, and the experience of its senior staff predates the formation of the Company. Exeter has provided expert witness testimony in hundreds of regulatory proceedings before state and federal regulatory commissions. This testimony has been on behalf of commission staffs, consumer advocates, and federal and state government clients. In addition, Exeter personnel have provided consulting and prepared reports/studies addressing broad policy issues facing particular states and industry-wide regulatory concerns. These testimonies and studies have involved such recent issues as industry restructuring, wholesale and retail open access, privatization of utility systems, stranded costs, contract evaluation/negotiation, and the development or evaluation of performance-based mechanisms (alternative forms of regulation) for electric utilities. Most recently, Exeter has also examined and provided testimony on renewable energy, energy conservation, demand response, procurement of default electricity supply service, and construction and siting of power plants.

Exeter staff has extensive experience in providing expert testimony and consulting on revenue requirements, rate of return, load forecasting, demand side management, depreciation, cost of service, prudency, rate design, fuel costs, purchase power costs, competition (both wholesale and retail), utility resource planning, cogeneration analysis and merger issues.

NATURAL GAS

Exeter Associates has been extensively involved in natural gas regulatory issues since the mid-1970's. After the adoption of Federal Energy Regulatory Commission (FERC) Order No. 636 and subsequent unbundling of interstate pipeline service in 1993, local gas distribution companies (LDCs) have become entirely responsible for the gas procurement function, a responsibility primarily borne by interstate pipelines prior to adoption of FERC Order No. 636. Exeter's engagements have included evaluation of LDC gas procurement practices and policies in the post-Order No. 636 environment on behalf of public utility commission (PUC) staffs and consumer advocates. Exeter has provided expert witness assistance to PUC staffs and consumer advocates in numerous regulatory proceedings before state and federal regulatory authorities addressing revenue requirements, cost allocation and rate design issues. Exeter professionals have advised state and federal clients concerning issues related to natural gas industry restructuring. addressing issues such as performance-based gas procurement programs, stranded costs, unbundling of LDC services, and new regulations to promote competition under conditions of an evolving market structure. Exeter has also assisted clients in the direct procurement of natural gas supplies and contract negotiations in the continually evolving competitive gas acquisition markets.

WATER/WASTEWATER

Exeter Associates' personnel have extensive experience in designing water/wastewater rates, performing cost allocation studies, evaluating revenue requirements, and addressing other aspects of water and wastewater regulation. Because of the substantial capital improvements required by water utilities to comply with the quality standards of the Safe Drinking Water Act (SDWA) and its amendments, significant increases in water rates are often required. Exeter has extensive experience in addressing the allocation and recovery of SDWA-related costs.

In addition to the staff's providing expert testimony in numerous regulatory proceedings throughout the U.S. on behalf of state and federal government clients, Exeter personnel have assisted clients in negotiations for water supply, rates, service characteristics, and billing arrangements. In addition to these issues, Exeter personnel have addressed the adequacy of infrastructure, privatization of federally-owned water treatment and storage facilities and water distribution systems, and issues related to fire protection.

EXETER ASSOCIATES, INC. RECENT CLIENTS

Exeter Associates' professional staff members have served a broad range of client organizations including public service commissions, consumer advocates, government agencies and private firms. Recent clients include:

Arkansas Public Service Commission Brookhaven National Laboratory Center for Resource Solutions Colorado River Commission of Nevada Community Legal Services, Inc. Defense Logistics Agency Energy Delaware Division of the Public

Delaware Public Service Commission Fermi National Accelerator Laboratory General Electric

Advocate

General Services Administration Hawaii Public Utilities Commission Illinois Citizens Utility Board Imperial Irrigation District Indiana Office of Utility Consumer Counselor

Lawrence Berkeley National Laboratory Lawrence Livermore National Laboratory

Louisiana Public Service Commission Maine Office of the Public Advocate Maine Public Utilities Commission Maryland Department of the Environment

Maryland Energy Administration Maryland Office of People's Counsel Maryland Power Plant Research

Maryland Power Plant Research Program

Maryland Public Service Commission Massachusetts Attorney General – Office of Ratepayer Advocacy

Midwest Renewable Energy Tracking System

National Association of Regulatory Utility Commissioners National Nuclear Security Administration

National Renewable Energy Laboratory New Hampshire Office of Consumer Advocate

Northrop Grumman

Office of the Ohio Consumers' Counsel Pennsylvania Office of Attorney General Pennsylvania Office of Consumer Advocate

Public Utilities Commission of Ohio Regulatory Assistance Project Rhode Island Division of Public Utilities & Carriers

SLAC National Accelerator Laboratory
Strategic Petroleum Reserve
Sustainable Energy Advantage
Tennessee Attorney General -

Tennessee Attorney General – Consumer Advocate and Protection Division

Tennessee Regulatory Authority
Township of Bedminster, New Jersey
U.S. Air Force – Air Force Civil Engineer
Center

U.S. Army – Commercial Utilities Program, U.S. Army Corps of Engineers

U.S. Department of Defense

U.S. Department of Energy

Utah Office of Consumer Services

The Utility Reform Network

Western Area Power Administration – Desert Southwest Region

Western Interstate Energy Board

EXETER ASSOCIATES, INC. KEY STAFF MEMBERS

EXETER ASSOCIATES, INC. specializes in serving clients engaged in litigative, policymaking, and decision-making activities and in providing the highest quality consulting services to clients in the areas of regulatory policy, industry restructuring, utility supply planning, contract negotiation, and on a wide range of other contemporary economic issues. The senior professional staff has provided expert testimony on numerous occasions before state, federal, and foreign regulatory agencies; state and federal courts, the Federal Energy Regulatory Commission, the U.S. Postal Rate Commission, and U.S. Congress and state legislative committees and subcommittees. Summaries of the qualifications of Exeter's senior staff are presented below:

MR. DWIGHT D. ETHERIDGE is a principal at Exeter Associates with 29 years of wide ranging experience in the electric utility industry. His areas of expertise include retail competition, energy markets, risk management and control, distributed generation, telecommunications, contract rate negotiations, rate design, cost allocation and forecasting, revenue requirements and benchmarking studies. Mr. Etheridge supports clients on multiple utility issues, including planning and options studies, cost analyses related to negotiations and utility rate cases, power procurement and price projections, risk management and energy price hedging programs, and utility infrastructure analyses. While employed by an investor-owned utility, Mr. Etheridge held increasingly more responsible management positions in strategic, deregulation, pricing, and planning areas, including reporting to the CEO during electric deregulation and a merger of two utilities. Mr. Etheridge has extensive experience developing analytical and strategic solutions on a variety of utility issues and communicating on those issues to regulatory commissions, legislatures, senior management, boards of directors and the public. He has presented expert testimony on over 30 occasions and has acted as a spokesperson numerous times on television, radio, and in print. Mr. Etheridge holds a B.S. in business administration from the University of California, Berkeley.

MR. JEROME D. MIERZWA is a principal of Exeter Associates and a senior analyst with 35 years of public utility regulatory experience. At Exeter, Mr. Mierzwa has conducted purchased gas cost allocation analysis and rate design analysis, management audits and similar investigations of the natural gas supply and procurement policies and practices of interstate gas pipelines and local distribution companies (LDCs). Most recently, Mr. Mierzwa has been involved in evaluating performance-based incentive regulation for LDC purchased gas costs and the unbundling of LDC services. Mr. Mierzwa has participated in developing utility class cost-of-service studies, has presented testimony sponsoring gas, water, and wastewater utility cost-of-service studies, least-cost gas procurement and incentive regulation, in addition to presenting testimony addressing utility rate base, expenses and revenues. Mr. Mierzwa holds a B.S. in marketing and an M.B.A. in finance from Canisius College.

MS. CHRISTINA R. MUDD is a principal at Exeter Associates, Inc. with 20 years of experience in energy efficiency, renewable energy, and climate change policy. With Exeter Ms. Mudd provides detailed analysis on the economic impacts of energy and environmental policies. Ms. Mudd participates in the Maryland staff working group for the Regional Greenhouse Gas Initiative, assists the Maryland Department of Natural Resources, Maryland Energy Administration and Maryland Department of Environment reviewing policies and programs related to electricity regulation, energy efficiency, renewable energy, and climate change. Ms. Mudd also provides technical support to federal agencies by reviewing utility supply contracts and rates, and reviewing the economic feasibility of alternative energy projects. Ms. Mudd served as the Executive Director of the National Council on Electricity Policy from January 2005 to December 2006. The National Council is a partnership between the National Association of Regulatory Utility Commissioners, National Association of State Energy Officials, National Governors' Association, and National Conference of State Legislators. Ms. Mudd holds a B.S. in political science and biology from James Madison University and an M.A. in international affairs with a concentration in economics and energy policy from Johns Hopkins University School for Advanced International Studies.

MR. KEVIN L. PORTER is a principal of Exeter Associates and a senior analyst with nearly 30 years of experience. Mr. Porter has been active in renewable energy analysis and research since 1984. His scope of expertise includes the technical and economic status of renewable energy technologies, design and implementation of state and federal renewable energy policies, transmission access and pricing for renewable energy technologies, and electricity policy in general. He has advised the National Renewable Energy Laboratory, the State of Maryland, the American Wind Energy Association, and other clients on renewable energy and green power procurement and policy design, and has written or co-written over 60 reports, conference papers, and journal articles. He holds a B.S. in environmental studies from Lewis & Clark College in Portland, Oregon, and an M.A. in economics from The American University in Washington, D.C.

DR. SERHAN OGUR is a principal of Exeter Associates with over 18 years of experience in the energy industry specializing in organized wholesale (Regional Transmission Organization/Independent System Operator) and retail electricity markets. His diverse background comprises energy management and consulting; analysis, design, and reporting of RTO electricity markets and products; and state and federal regulation of electric utilities. Dr. Ogur's recent engagements at Exeter include analysis of conventional and renewable electricity supply contracts, utility rates and tariffs, and energy markets and prices; power procurement; default electric service design; project evaluation; assessment of demand response opportunities; devising congestion hedging strategies; and price forecasting. Dr. Ogur holds a B.A. in economics from Bogazici University, Turkey and a Ph.D. in economics from Northwestern University.

ATTACHMENT B

Key Personnel Resumes

Kevin L. Porter Stacy L. Sherwood

KEVIN L. PORTER

Mr. Porter is a Vice President and Principal at Exeter Associates, Inc., with over 35 years of experience in renewable energy technologies, state and federal regulation of the electric power industry, and transmission access and policy. He leads and performs research in the design, implementation and evaluation of renewable energy policies; on the grid integration of renewable energy technologies; and on the development and implementation of transmission policies.

Mr. Porter's recent work includes a comprehensive evaluation of the Maryland Renewable Portfolio Standard; an assessment of the potential of energy storage technologies and market and regulatory barriers towards greater deployment of such technologies in Maryland; a review of technologies and market and regulatory barriers towards greater deployment of such technologies in Maryland; significant contributions towards the Maryland Governor's task force on renewable energy siting; and a report on the potential of nuclear power. He also has contributed to research on trends in generator interconnection filings at regional transmission organizations across the country, and the estimated costs of interconnecting those generators.

Mr. Porter's past work includes studies of the Federal Energy Regulatory Commission's generation interconnection policies; the development of state transmission infrastructure authorities; the performance of state renewable portfolio standards in the Northeastern United States; state and regional initiatives to develop new transmission; advances in wind and solar forecasting; and on designing feed-in tariffs for renewable energy generation. He also led a large study for the California Energy Commission that assessed the feasibility of incorporating up to 33 percent renewable energy generation by 2020. He has also worked on creating Uniform Systems of Accounts in Ethiopia and Tanzania.

Mr. Porter provides technical assistance to Energy Foundation China on the grid integration of wind and solar power, transmission pricing, and electric power regulation in general. He has colled seven delegations of China renewable energy experts to the United States for forums and site visits concerning grid integration of wind and solar generation, and has frequently traveled to China to participate in renewable energy workshops and conferences.

He is considered one of the leading experts on renewable energy policy design and implementation, and he has authored or co-authored nearly 100 journal articles and research reports. His clients include or have included the American Wind Energy Association, the California Energy Commission, the Center for Resource Solutions, the Clean Energy States Alliance, the Energy Foundation, the Geothermal Energy Association, the Midwest Renewable Energy Tracking System, the National Association of Regulatory Utility Commissioners, the National Renewable Energy Laboratory, and the National Wind Coordinating Collaborative and the Regulatory Assistance Project.

Education:

B.S. (Environmental Studies) - Lewis and Clark College, 1982

M.A. (Economics) - American University, 1998

Previous Employment:

1990-2001 Senior Policy Analyst

National Renewable Energy Laboratory

Washington, D.C.

1988-1990 Research Analyst

Investor Responsibility Research Center

Washington, D.C.

1985-1988 Research Analyst

Renewable Energy Institute

Washington, D.C.

1985 Research Assistant

Analysis, Review & Critique

Washington, D.C.

1984 Intern

Environmental and Energy Study Institute

Washington, D.C.

1983 Legislative Aide/Research Assistant

State Senator John Kitzhaber

Salem, OR

1982-1983 Intern

Congressman Ron Wyden

Portland, OR

Professional Work Experience:

At the National Renewable Energy Laboratory, Mr. Porter performed analyses on the economic and technical status of renewable energy technologies; federal and state renewable energy policy development and impacts; and the implications of electric restructuring for renewable energy technologies. He has advised multiple states, industry groups and the U.S. Department of Energy on the development and implementation of renewable energy policies, especially the renewables portfolio standard and system benefit charges. He also has conducted research in transmission access and transmission pricing in competitive markets. He also designed a

database of U.S. grid-connected renewable electric projects that is available on the Internet, and has been consulted by DOE, EPA, industry groups, state regulatory agencies, and other businesses and academic institutions on the database.

At the Investor Responsibility Research Center, Mr. Porter co-wrote a directory of the 100 leading developers of renewable energy power plants in the U.S. and overseas. The directory was cited in the *Wall Street Journal*, the *New York Times*, and the *Washington Post*, as well as on CNN and Voice of America. Mr. Porter also assisted in research on nuclear power investments in preparations for a socially responsible investment fund, now offered as an investment option by TIAA-CREF, the world's largest retirement fund.

At the Renewable Energy Institute, Mr. Porter helped compile a directory of the economic, technical and market status renewable energy technologies, co-wrote analyses of how utilities evaluate renewable energy technologies, and how states implemented Public Utility Regulatory Policies Act of 1978.

Major Publications and Reports:

- Governor's Task Force on Renewable Energy Development and Siting, Final Report Prepared for Governor Larry Hogan, August 14, 2020 (with Helen Stewart, Ryan Opsal, Stacy Sherwood, Will Cotton, and many others).
- Nuclear Power in Maryland: Status and Prospects, Maryland Department of Natural Resources, Power Plant Research Program, January 2020 (with Diane Mountain and Matthew Hoyt).
- Final Report Concerning the Maryland Renewable Portfolio Standard as Required by Chapter 393 of the Acts of the Maryland General Assembly of 2017, Maryland Department of Natural Resources, Power Plant Research Program, December 2019 (with Rebecca Widiss, and Matthew Hoyt).
- Interim Report Concerning the Maryland Renewable Portfolio Standard as Required by Chapter 393 of the Acts of the Maryland General Assembly of 2017, Maryland Department of Natural Resources, Power Plant Research Program, December 2018 (with Rebecca Widiss, Stacy Sherwood and Matthew Hoyt).
- Energy Storage in Maryland, Maryland Department of Natural Resources, Power Plant Research Program, December 2018 (with Rebecca Widiss, Laura Miller, Katherine Fisher, William Cotton, Nick DiSanti, Angela Richardson, Stacy Sherwood, Matthew Hoyt and Cali Clark).
- "Leveling the Playing Field for Storage Resources in China's Electricity Markets: A View from the U.S.," Regulatory Assistance Project blog, March 20, 2018 (with Max Dupuy).
- Long-Term Electricity Report for Maryland, Maryland Department of Natural Resources, Power Plant Research Program, December 2016 (with Steven Estomin, Rebecca Widiss, Laura Miller, Nick DiSanti, Stacy Sherwood, and Cali Clark).

- Ethiopia: Uniform System of Accounts Implementation Plan, U.S. Agency for International Development/National Association of Regulatory Utility Commissioners, October 2016 (with Lafayette Morgan and Larry Blank).
- Final Report: Developing a Uniform System of Accounts and Data Collection Template for Ethiopia, Tanzania and East Africa, U.S. Agency for International Development/National Association of Regulatory Utility Commissioners, October 2016 (with Lafayette Morgan and Larry Blank).
- 'Renewables-Friendly Grid Development Strategies: Experience in the United States, Potential Lessons for China, October 2015 (with David Hurlbut, Ella Zhou, and Douglas J. Arent).
- M-RETS and the U.S. Environmental Protection Agency's Clean Power Plan: An Options Paper, Midwest Renewable Energy Tracking System, October 2015 (with Rebecca Widiss).
- Variable Generation and Electricity Markets, Utility Variable Generation Integration Group, March 2015 (with Kevin Starr and Andrew Mills).
- Greater Flexibility in the Power Sector in the West: Results of Industry Interviews, the Western Interstate Energy Board, February 2015 (with Kevin Starr).
- A Review of Variable Energy Resource Integration Charges, the Western Interstate Energy Board, February 2015 (with Michael Buckley, Rebecca Widiss, Kabeed Mansur and Kevin Starr).
- Opportunities for Low-Carbon Power Sector Regulation in China: Lessons Learned from Brazil, Europe and the United States, the Regulatory Assistance Project and the World Bank, December 2014 (with Max Dupuy, Rick Weston, Fritz Kahrl, Wang Xuan, Riley Allen, and David Crossley).
- A Review of Variable Generation Forecasting in the West, the National Renewable Energy Laboratory, March 2014 (with Rebecca Widiss).
- Regulatory Framework and Cost Regulations for the Brazilian National Grid (Transmission System), the Regulatory Assistance Project, October 2013 (with Felipe Salcedo).
- Recommendations for Power Sector Policy in China: Practical Solutions for Energy, Climate, and Air Quality, the Regulatory Assistance Project, October 2013 (with David Moskovitz, Max Dupuy, Rick Weston, Fritz Kahrl, Riley Allen, David Crossley, Chris James, Wang Xuan, and Chris James).
- Challenges and Approaches to Integrating Variable Generation into Electricity Grids, World Bank, May 2013 (with Marcelino Madrigal).
- A Review of Variable Generation Integration Charges, National Renewable Energy Laboratory, March 2013 (with Sari Fink, Michael Buckley, Jennifer Rogers and Bri-Mathias Hodge).

- Review of Industry Practice and Experience in the Integration of Wind and Solar Generation, PJM, November 2012 (with Sari Fink, Jennifer Rogers, Christina Mudd, Michael Buckley, and Cali Clark).
- Meeting Renewable Energy Targets in the West at Least Cost: The Integration Challenge, Western Governors Association, June 2012 (with Lisa Schwartz, Christina Mudd, Sari Fink, Jennifer Rogers, Mike Hogan, Lori Bird, Dave Lamont and Brendan Kirby).
- Survey of Variable Generation Forecasting in the West, National Renewable Energy Laboratory, April 2012 (with Jennifer Rogers).
- Summary of Time Period-Based and Other Approximation Methods for Determining the Capacity Value of Wind and Solar in the United States, National Renewable Energy Laboratory, March 2012 (with Jennifer Rogers).
- Wind Power and Electricity Markets, Utility Wind Integration Group, October 2011 (with Jennifer Rogers).
- Alternative Energy Resource Market Assessment, National Association of Regulatory Utility Commissioners, September 2011 (with Ed Holt, Jennifer Rogers and Jason Gifford).
- Survey of Transmission Cost Allocation Methodologies, National Renewable Energy Laboratory, February 2011, NREL/SR-5500-49880 (with Sari Fink, Christina Mudd, and Jennifer Rogers).
- A Guide for Ontario Energy Policy Makers, National Regulatory Research Institute, September 2011 (with Scott Hempling and Thomas Stanton).
- The Relationship between Wind Generation and Balancing-Energy Market Prices in ERCOT: 2007–2009, National Renewable Energy Laboratory, November 2010, NREL/SR-5500-49415 (with Emma Nicholson and Jennifer Rogers).
- "Wind at Our Backs: The Impact of Variable Renewable Energy on U.S. Electricity Markets," *IEEE Energy and Power Magazine*, Vol. 8(5) 2010, pp. 63-71 (with J. Charles Smith, Steve Beuning, Henry Durrwachter, Erik Ela, David Hawkins, Brendan Kirby, Warren Lasher, Ken Schuyler, Paul Sotkiewicz and Jonathan Lowell).
- The Relevance of Generation Interconnection Procedures to Feed-in Tariffs in the United States, National Renewable Energy Laboratory, October 2010, NREL/SR-6A20-48987 (with Sari Fink and Jennifer Rogers).
- Transmission Cost Allocation Methodologies for Regional Transmission Organizations (table of cost allocation methodologies), July 2010, NREL/SR-6A20-48987 (with Sari Fink and Jennifer Rogers).
- Examples of Wind Energy Curtailment Practices, National Renewable Energy Laboratory, July 2010, NREL/SR-550-48737 (with Sari Fink and Jennifer Rogers).

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STACY L. SHERWOOD

Ms. Sherwood is an Economist at Exeter Associates, Inc. At Exeter, Ms. Sherwood develops utility service assessments, provides bill and rate analysis, and assesses and evaluates the effectiveness of energy conservation and efficiency programs and smart meter implementation plans. She also conducts analysis on renewable energy initiatives and life-cycle cost analysis of renewable energy projects. Prior to joining Exeter, Ms. Sherwood worked on energy efficiency with the State of Maryland.

Education

B.A. (Economics, Business, and Accounting) – McDaniel College, 2009

Previous Employment

2013-2015	Assistant Director	
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Maryland Public Service Commission

Baltimore, Maryland

2011-2013 Regulatory Economist II

Maryland Public Service Commission

Baltimore, Maryland

2009-2011 Regulatory Economist I

Maryland Public Service Commission

Baltimore, Maryland

Professional Experience

Ms. Sherwood's work at Exeter is primarily related to energy efficiency, renewable energy, automated metering infrastructure, cost recovery, and revenue requirements. Ms. Sherwood has successfully worked with utilities, state energy offices, attorney general's offices, consumer advocates, and commission staffs. Ms. Sherwood provides ongoing support to the Arkansas Office of the Attorney General and the Pennsylvania Office of Consumer Advocates regarding their respective states' utility energy efficiency programs, including analysis of utility energy efficiency plans and proposed plan amendments; analysis of issues raised during stakeholder meetings; review of riders and surcharges related to cost-recovery; and provide recommendations on technical and policy-related matters. She has contributed to several publications issued by the Maryland Power Plant Research Program regarding electricity in Maryland, including load forecasting, analysis of policy impacts, and inclusion of renewable resources. Additionally, Ms. Sherwood has worked with the Department of Defense to study the demand response potential at various Army Garrisons throughout the United States by conducting on-site visits and performing analysis of electric bills.

At the Maryland Public Service Commission, Ms. Sherwood performed analysis on the EmPOWER Maryland energy efficiency and demand response programs, the Exelon Customer Investment Fund, and served as lead analyst for the EmPOWER Maryland limited income programs implemented by the Maryland Department of Housing and Community Development. For those initiatives, she developed reporting templates and guidelines; oversaw evaluation, measurement, and verification of program results; and recommended and ensured compliance with policies. Additionally, Ms. Sherwood assisted with the development of regulations proposed before the Commission to implement the 2013 Maryland Offshore Wind Energy Act.

Publications and Consulting Reports

- Fort Riley Assessment of Utility Contracts and Costs, on behalf of the U.S. Army Installation Management Command and Army Commercial Utilities Program, April 2019 (with Steven Estomin of Exeter Associates, Inc.).
- Sierra Army Depot Assessment of Utility Contracts and Costs, on behalf of the U.S. Army Installation Management Command and Army Commercial Utilities Program, March 2019 (with Steven Estomin of Exeter Associates, Inc.).
- Fort Riley Assessment of Demand Response Opportunities, on behalf of the U.S. Army Office Chief of Staff for Installation Management, January 2018 (with Christina Mudd of Exeter Associates, Inc. and Jim Clark of Clark Energy, Inc.).
- Fort Gordon Assessment of Demand Response Opportunities, on behalf of the U.S. Army Office Chief of Staff for Installation Management, June 2017 (with Christina Mudd of Exeter Associates, Inc. and Jim Clark of Clark Energy, Inc.).
- Cumulative Environmental Impact Report, on behalf of the Power Plant Research Program, Maryland Department of Natural Resources, December 2016 (with Steven Estomin, Kevin Porter, Rebecca Widiss, and Nicholas DiSanti of Exeter Associates, Inc.; Environmental Resources Management, Inc.; Versar, Inc.; Metametrics, Inc.; Spectrum Environmental Services, Inc.; and RGM Incorporated).
- Long-Term Electricity Report for Maryland, on behalf of the Power Plant Research Program, Maryland Department of Natural Resources, December 2016 (with Steven Estomin, Kevin Porter, Rebecca Widiss, Nicholas DiSanti, Cali Clark, and Laura Miller of Exeter Associates, Inc.).
- Fort Stewart Assessment of Demand Response Opportunities, on behalf of the U.S. Army Office Chief of Staff for Installation Management, September 2016 (with Christina Mudd and Felipe Salcedo of Exeter Associates, Inc. and Jim Clark of Clark Energy, Inc.).

Edwards Air Force Base Feasibility of a Geothermal Project, on behalf of the U.S. Air Force Civil Engineer Center, April 2016 (with Christina Mudd and Kevin Porter of Exeter Associates, Inc.).

Expert Testimony

- Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020818, Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase IV Plan, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Pending)
- Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020830, Petition of PECO Energy Company for Approval of its Energy Efficiency and Conservation Phase IV Plan, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Pending)
- Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020824, Petition of PPL Electric Utilities for Approval of its Energy Efficiency and Conservation Phase IV Plan, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Pending)
- Before the Louisiana Public Service Commission, Docket No. U-35707 Application for Approval to Acquire and Install an Automated Metering System and Request for Cost Recovery and Related Relief, December 2020, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Pending)
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3020919

 Pennsylvania Public Utility Commission v. Audubon Water Company, November 2020, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3020256

 Pennsylvania Public Utility Commission v. City of Bethlehem Water Department,

 November 2020, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

- Before the Louisiana Public Service Commission, Docket No. U-35456 Application for Certification of a Replacement Advanced Metering System and Approval of Related Financing, November 2020, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Pending)
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3019612

 Pennsylvania Public Utility Commission v. Reynolds Disposal Company, October 2020, for the Pennsylvania Office of Consumer Advocate. Participated in mediation regarding reasonableness of the overall revenue increase.
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3010955

 Pennsylvania Public Utility Commission v. City of Lancaster Sewer Fund, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008208

 Pennsylvania Public Utility Commission v. Wellsboro Electric Company, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008209 Pennsylvania Public Utility Commission v. Valley Energy, Inc, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008212, Pennsylvania Public Utility Commission v. Citizens' Electric Company of Lewisburg, PA, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3009559,

 Pennsylvania Public Utility Commission v. Eaton Sewer & Water Company, Inc. –

 Wastewater Division, August 2019, for the Pennsylvania Office of Consumer Advocate.

 Participate in mediation regarding reasonableness of the overall revenue increase.
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3009567, Pennsylvania Public Utility Commission v. Eaton Sewer & Water Company, Inc. – Water Division, August 2019, for the Pennsylvania Office of Consumer Advocate. Participate in mediation regarding reasonableness of the overall revenue increase.

- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008947,

 Pennsylvania Public Utility Commission v. Community Utilities of Pennsylvania Inc.

 Water Division, July 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008948,

 Pennsylvania Public Utility Commission v. Community Utilities of Pennsylvania Inc.

 Wastewater Division, July 2019, for the Pennsylvania Office of Consumer Advocate.

 Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3006904, Pennsylvania Public Utility Commission v. The Newtown Artesian Water Company (Supplement No. 136 to Tariff Water – Pa. P.U.C. No. 9), March 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3006814, Pennsylvania Public Utility Commission v. UGI Utilities, Inc – Gas Division (Utility Code 123100, Filed Tariff Gas- Pa. P.U.C. Nos. 7 and 7S), January 2019, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of its proposed consolidated natural gas energy efficiency plan. (Case settled prior to cross-examination.)
- Before the Pennsylvania Public Utilities Commission, Docket No. M-2018-3004144, Petition of UGI Utilities, Inc. Electric Division for Approval of Phase III of its Energy Efficiency and Conservation Plan, August 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3001307, Pennsylvania Public Utility Commission v. Hidden Valley Utility Services, L.P. – Wastewater (General Rate Increase Filed Pursuant to 66 PS. CS 1308, Including Answers to 52 PA. Code 53.52), April 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.
- Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3001306, Pennsylvania Public Utility Commission v. Hidden Valley Utility Services, L.P. – Water (General Rate Increase Filed Pursuant to 66 PS. CS 1308, Including Answers to 52 PA. Code 53.52), April 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

- Before the Pennsylvania Public Utilities Commission, Docket No. P-2015-2497267, Petition of Duquesne Light Company for Approval of its Smart Meter Procurement and Installation Plan, February 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the inclusion of additional costs related to the Plan's implementation.
- Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2477174, Petition of UGI Utilities, Inc. Electric Division for Approval of Phase II of its Energy Efficiency and Conservation Plan, February 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)
- Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2515642, Petition of PPL Electric Utilities for Approval of its Energy Efficiency and Conservation Phase II Plan, January 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)
- Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2515375, Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase II Plan, January 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)
- Before the Public Utilities Commission of Rhode Island, Docket No. 4595, Newport Water Division Rate Application to Collect Additional Revenues of \$1,304,595 for a Total Cost of Service of \$20,151,440, December 2015, on behalf of the Division of Public Utilities and Carriers. Testified regarding reasonableness of the overall rate revenue increase.
- Before the Maryland Public Service Commission, Case No. 9311, In the Matter of the Application of Potomac Electric Power Company for an Increase in its Retail Rates For the Distribution of Electric Energy, April 2013, on behalf of the Maryland Public Service Commission Staff. Testified regarding the inclusion of advanced metering infrastructure meters and energy advisor and engineer positions in rates.